

I have been a licensed Amateur Radio Operator for 48 years, getting my Novice in January 1955 and earning my Amateur Extra in 1977. I became a VE in 1984. Further, I worked in electronics for 20 years and am now a Professor Emeritus, having retired from a major community college district after twenty years. I am neither an engineer nor attorney, as many of the writers of petitions and comments seem to be. Still, this background gives me good insight into the level of knowledge needed to function on technical and communications planes.

I speak only for myself, not for any amateur related organizations that I belong to; nor do they speak for me.

My opinion of RM-10785 is that it should be rejected for the following reasons:

His wording in paragraph 4 is very similar to that of No Code International (NCI) Please see my comments re RM-10786 for amplification.

In paragraph 6, the FCC did not include a Sunset clause and therefore, public discussion is mandatory for resolution of this issue. At this late date, (September 28), I have skimmed through some comments on all seven petitions and found many interesting ones on both sides.

In 7, the ITU did indeed modify the wording, but did not ban Morse testing outright.

In 8, I would like to see an FCC reference to this point.

And in 9, how must Part 97 be changed, especially with reference to Elements 2, 3 and 4, to accommodate his petition?

Therefore, I would not support this RM.

Thank you for reading and considering my view on this Rulemaking.

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